

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
SUBREGION 24**

Betterroads Asphalt Corporation,)	CASES: 12-CA-183927
)	12-CA-187042
and)	
)	
Virgin Islands Workers Union)	
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MOTION REQUESTING CONTINUANCE OF TRIAL DATE

COMES NOW, Respondent, Betterroads Asphalt Corporation, by and through its undersigned counsel and respectfully states:

During a conference call with Attorney Ana Ramos earlier today, Betterroads found out for the first time that this matter had been scheduled for a final hearing on March 27, 2018. Betterroads was never notified of this hearing. As such Betterroads is at a disadvantage in having to essentially prepare for a hearing on the merits in just over two weeks.

In addition, the undersigned has numerous depositions in the USVI and state side in the next two weeks and making it extremely difficult to travel to Puerto Rico to meet his client and confer with his witness. This in addition to a potential conflict on the scheduled trial dated due to a pending mediation tentatively for the same date.

WHEREFORE, it is respectfully requested that the National Labor Relations Board be advised of the above and continue this trial to a later date.

Respectfully submitted,

LAW OFFICES OF WILFREDO A. GEIGEL
Attorney for Respondent

Dated: March 6, 2018

BY: /s/Eugenio W.A. Géigel-Simounet
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th, day of March, 2018, I caused a true copy of
the forgoing document to email to:

Charles Nicolas, President
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/s/ Eugenio W.A. Géigel-Simounet, Esq.